



Louisville Metro Air Pollution Control District  
701 West Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137



## Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-1440-20-F

Plant ID: 1440

Effective Date: 05/19/2020

Expiration Date: 05/31/2025

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

**Source:** Algood Food Company  
7401 Trade Port Drive  
Louisville, KY 40258

**Owner:** Algood Food Company  
7401 Trade Port Drive  
Louisville, KY 40258

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve months and no later than ninety days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: PM/PM<sub>10</sub>  
Tons/year: < 25

Application No.:  
Public Notice Date:

See **Application and Related Documents** table.  
04/17/2020

Permit writer: Shannon Hosey

A handwritten signature in blue ink, appearing to read "Matt K.", is positioned above the title of the Air Pollution Control Officer.

Air Pollution Control Officer  
5/19/2020

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**Permit Revisions and Changes**

<b>Permit No.</b>	<b>Public Notice Date</b>	<b>Issue Date</b>	<b>Change Type</b>	<b>Description/Scope</b>
182-02-F	12/04/2005	03/31/2006	Initial	Initial Permit Issuance
O-1440-15-F	02/18/2015	04/07/2015	Renewal	Permit Renewal
O-1440-20-F	04/17/2020	05/19/2020	Renewal	Permit Renewal and Incorporating Construction Permit C-1440-1003-15-F

**Construction Permit Summary**

<b>Permit No.</b>	<b>Issue Date</b>	<b>Description</b>
C-1440-1003-15-F	09/23/2015	<p>One (1) Nimbus 1200 Laser Sorter</p> <p>One (1) Wolverine Proctor Roaster with a GCH International Cooling Zone Scrubber and a GCH International (1) Heating Zone Scrubber</p> <p>One (1) Satake EVO RGB8 Laser Sorter with one (1) Fisher-Klosterman Cyclone</p> <p>One (1) LMC 360 Blancher</p>

**Application and Related Documents**

<b>Document Number</b>	<b>Date</b>	<b>Description</b>
79600	09/26/2016	AP-100A Application to incorporate construction permit into operating permit O-1440-15-F
129776	01/29/2020	Permit Renewal Application
130260	02/04/2020	Permit Application Completeness Letter

## Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors, published by U.S.EPA</i>
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
(M)SDS	- (Material) Safety Data Sheet
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

### **Preamble**

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

### **General Conditions**

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
- G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
- G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
- G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
- G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

- G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
- G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
- G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
- G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM<sub>10</sub>, PM<sub>2.5</sub>, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G12. Unless specified elsewhere in this permit, the owner or operator shall submit semi-annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All compliance reports shall include the following per Regulation 2.17, section 3.5.
- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
  - The signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

**Reporting Period**

January 1 - June 30

July 1 - December 31

**Report Due Date**

August 29

March 1 of the following year

- G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.06	Permit Requirements – Other Sources
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources

Regulation	Title
7.01	General Provisions (New Affected Facilities)

- G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

- G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
- G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
- G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District  
701 W. Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137***

**Plantwide Requirements****Facility Description**

Manufactures Peanut Butter

**Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Definitions	1, 2

## Plantwide Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. PM/PM<sub>10</sub>/PM<sub>2.5</sub>

The owner or operator shall not cause or allow the plantwide PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions to equal or exceed 25 tons during any consecutive 12-month period.<sup>1</sup>  
[Regulation 5.00, section 1.13.5.1]

#### b. VOC

The owner or operator shall not allow or cause total plantwide VOC emissions to equal or exceed 25 tons during any consecutive 12-month period.<sup>1</sup>  
[Regulation 5.00, section 1.13.5.1]

### S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

#### a. PM/PM<sub>10</sub>/PM<sub>2.5</sub>

The owner or operator shall, monthly, calculate and record the monthly and 12-consecutive month plantwide total emissions for PM/PM<sub>10</sub>/PM<sub>2.5</sub> for each month in the reporting period.

#### b. VOC

The owner or operator shall, monthly, calculate and record the monthly and 12-consecutive month plantwide total emissions for VOC for each month in the reporting period.

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<sup>1</sup> On 11/25/2014, the source requested the limits of the criteria pollutant PM/PM<sub>10</sub>/PM<sub>2.5</sub> to qualify as a FEDOOP exempt from STAR, as defined by Regulation 5.00, section 1.13.5. Also, because the emissions of all regulated air pollutants must not exceed 25 tpy, the source needs a 25 tpy VOC limit since the potential emissions are over 25 tpy.

**S3. Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

**a. PM/PM<sub>10</sub>/PM<sub>2.5</sub>**

The owner or operator shall report the plantwide monthly and 12-consecutive month total emissions for PM/PM<sub>10</sub>/PM<sub>2.5</sub> for each month in the reporting period.

**b. VOC**

The owner or operator shall report the plantwide monthly and 12-consecutive month total emissions for VOC for each month in the reporting period.

**Emission Unit U1: Sorting, Roasting, Blanching****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for New Process Operations	1 through 3

**Equipment**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
E1	Laser Sorter, BEST USA, Inc., Helius 1200 (unloading and screening)	2013	7.08	C1	S1
E2	Peanut Roaster, Proctor & Schwartz, K910124, natural-gas direct fired	2002	7.08	C2	S2
E3	Peanut Blancher, LMC 360	2019	7.08	C4	S4
E4	Optical Sorter, Satake EVO RGB8	2019	7.08	C4	S4
E5	Laser Sorter, BEST USA, Inc., Nimbus 1200 (unloading and screening)	2015	7.08	C1	S1
E6	Peanut Roaster, Wolverine Proctor P500012, natural-gas direct fired	2015	7.08	C3	S3
E7	Peanut Blancher, LMC 360	2015	7.08	C5	S5
E8	Optical Sorter, Satake EVO RGB8	2015	7.08	C5	S5

**Control Devices**

<b>Control ID</b>	<b>Description</b>	<b>Control Efficiency</b>
C1	Cyclone	85%
C2 <sup>2</sup>	Wet scrubber using water followed by in-line cartridge	95%
C3 <sup>2</sup>	Hot and cold zoned wet scrubber (GCH) followed by in-line cartridge	95%
C4	Cyclone	85%
C5	Cyclone (Fisher-Klosterman)	85%

<sup>2</sup> Roaster exhaust will pass through the scrubber which sprays a mist into air trapping contaminants. Air/water then passes through a series of filters that trap all contaminants in the airstream.

## U1 Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. Opacity

The owner or operator shall not allow or cause visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]

#### b. PM/PM<sub>10</sub>/PM<sub>2.5</sub>

- i. See Plantwide PM/PM<sub>10</sub>/PM<sub>2.5</sub> Standards
- ii. For Emission Points E1 and E5, the owner or operator shall not allow PM emissions to equal or exceed 16.76 lb/hr per piece of equipment, based on actual operating hours in a calendar day.<sup>3</sup> [Regulation 7.08, section 3.1.2]
- iii. For Emission Point E3, E4, E7, and E8 the owner or operator shall not allow PM emissions to equal or exceed 14.97 lb/hr per piece of equipment, based on actual operating hours in a calendar day.<sup>3</sup> [Regulation 7.08, section 3.1.2]
- iv. For Emission Point E2, the owner or operator shall not allow PM emissions to equal or exceed 11.73 lb/hr, based on actual operating hours in a calendar day.<sup>4</sup> [Regulation 7.08, section 3.1.2]
- v. For Emission Point E6, the owner or operator shall not allow PM emissions to equal or exceed 14.02 lb/hr, based on actual operating hours in a calendar day.<sup>4</sup> [Regulation 7.08, section 3.1.2]
- vi. The owner or operator shall operate and maintain the control devices (C1, C4, and C5) at all times that EP E1, E3, E4, E5, E7, or E8 is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice for minimizing emissions.

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<sup>3</sup> A one-time PM compliance demonstration was performed showing the potential lb/hr standards is met controlled.

<sup>4</sup> The potential uncontrolled hourly PM emissions from Emission Points E2 and E6 do not exceed the emission standard.

**S2. Monitoring and Record Keeping**

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

**a. Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

**b. PM/PM<sub>10</sub>/PM<sub>2.5</sub>**

- i. See Plantwide PM/PM<sub>10</sub>/PM<sub>2.5</sub> Monitoring and Record Keeping
- ii. The owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of the dust collectors for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.
- iii. For Emission Points E1, E3, E4, E5, E7, and E8, the owner or operator shall maintain daily records of any periods when a process was operating and an associated control device was not operating, or a declaration that the control device operated at all times that day when the process was operating. For each period when the control was not operating or was bypassed, the record must include:  
(1) Date;

- (2) Start time and stop time;
- (3) Identification of the control device and process equipment;
- (4) PM emissions during the event, in lb/hr;
- (5) Summary of the cause or reason for each event;
- (6) Corrective action taken to minimize the extent or duration of the event; and
- (7) Measures implemented to prevent reoccurrence of the situation that resulted in the event.

**S3. Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

**a. Opacity**

- i. The date, time, and results for each visible emission survey during which visible emissions were detected, or a negative declaration if no visible emission were observed;
- ii. The date, time, and results of each Method 9 or Method 22 observation conducted, or a negative declaration if no or observations were required;
- iii. Description of any corrective action taken.

**b. PM/PM<sub>10</sub>/PM<sub>2.5</sub>**

- i. See Plantwide PM/PM<sub>10</sub>/PM<sub>2.5</sub> Reporting
- ii. For Emission Points E1, E3, E4, E5, E7, and E8, the owner or operator shall maintain daily records of any periods when a process was operating and an associated control device was not operating, or a declaration that the control device operated at all times that day when the process was operating. For each period when the control was not operating or was bypassed, the record must include:
  - (1) Date;
  - (2) Start time and stop time;
  - (3) Identification of the control device and process equipment;
  - (4) PM emissions during the event, in lb/hr;
  - (5) Summary of the cause or reason for each event;

- (6) Corrective action taken to minimize the extent or duration of the event; and
- (7) Measures implemented to prevent reoccurrence of the situation that resulted in the event.

**Emission Unit U2: Printers and Sanitizing System****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.25	Standards of Performance for Existing Process Operations	1 through 3

**Equipment**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
E9	Date Printer, Hitachi Code, PXR-D460W	After 1979	7.25	NA	NA
E10	Tray Printer, Fox Jet, FXJT-62701208,	After 1979	7.25	NA	NA
E11	Sanitizing System, Biomist Inc.	After 1979	7.25	NA	NA

## U2 Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. VOC

For Emission Points E9, E10, and E11, the owner or operator shall limit the plantwide total VOC emissions to less than 5 tons per 12 consecutive months, unless a BACT is submitted and approved by the District.

[Regulation 7.25, Section 3]

### S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

#### a. VOC

For Emission Points E9, E10, and E11, the owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate and record the amount of VOC emissions during the 12 consecutive month period.

### S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

#### a. VOC

For Emission Points E9, E10, and E11, the owner or operator shall report the calendar month and consecutive 12-month VOC emissions for each month in the reporting period.

**Emission Unit UIA1: Emergency Generator****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
40 CFR 63 Subpart ZZZZ	Standards of Performance for New Volatile Organic Materials Loading Facilities	§63.6590(a) and §63.6590(c)
40 CFR 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	§60.4243(b), §60.4243(d), §60.4243(e), §60.4245(a)(1)-(a)(4) and §60.4237(c)

**Equipment**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
IA1	Natural Gas Reciprocating Internal Combustion Engine (RICE) Emergency Generator, Kohler, Model 150R2GB, 350 HP	12/2008	40 CFR 63, Subpart ZZZZ and 40 CFR 60, Subpart JJJJ	N/A	NA

## U3 Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. HAP

Emission Point IA1, a new stationary RICE located at an area source, must meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart JJJJ.<sup>5</sup> [40 CFR 63.6590(c)(1)]

#### b. Unit Operations

- i. Owners and operators of stationary spark-ignition internal combustion engine that commence construction after June 12, 2006, where the stationary SI ICE are manufactured on or after July 1, 2008, for engines with a maximum engine power less than 500 HP are subject to the provisions of 40 CFR 60, Subpart JJJJ.  
[40 CFR 60.4230(a)(4) and 40 CFR 60.4230(a)(4)(iii)]
- ii. Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE. For owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 100 HP (except gasoline and rich burn engines that use LPG) manufactured prior to January 1, 2011 that were certified to the certification emission standards in 40 CFR part 1048 applicable to engines that are not severe duty engines, if such stationary SI ICE was certified to a carbon monoxide (CO) standard above the standard in Table 1 to this subpart, then the owners and operators may meet the CO certification (not field testing) standard for which the engine was certified.  
[40 CFR 60.4233(e)]

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<sup>5</sup> This emergency generator is subject to 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, because it is a stationary reciprocating internal combustion engine (RICE) located at an area source of HAP emissions. However, according to 40 CFR 63.6590(c), this emergency generator must meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. No further requirements apply for the engine under 40 CFR 63 Subpart ZZZZ.

**Table 1 to Subpart JJJJ of Part 60 —NOX, CO, and VOC Emission Standards for Stationary Emergency Engines >25 HP**

Engine Type	Maximum Engine Power	Manufacture Date	Emission Standards					
			g/HP-hr			ppmvd at 15% O <sub>2</sub>		
			NO <sub>x</sub>	CO	VOC	NO <sub>x</sub>	CO	VOC
Emergency	HP ≥ 130	12/2008	2.0	4.0	1.0	160	540	86

- iii. Owners and operators of stationary spark-ignition internal combustion engine must operate and maintain stationary SI ICE that achieve the emission standards over the entire life of the engine. [40 CFR 60.4234]

## **S2. Monitoring and Record Keeping**

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

### **a. Unit Operation**

- i. If you are an owner or operator of a stationary SI internal combustion engine and must comply with the emission standards specified in §60.4233(d), you must demonstrate compliance according to one of the methods specified in §60.4243(b)(1) and (2). [40 CFR 60.4243(b)]
- ii. Purchasing an engine certified according to procedures specified in 40 CFR 60 Subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods specified in §60.4243(a). [40 CFR 60.4243(b)(1)]
- iii. If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in §60.4243(d)(1) through (3). In order for the engine to be considered an emergency stationary ICE under 40 CFR 60 Subpart JJJJ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §60.4243(d)(1) through (3), is prohibited. If you do not operate the engine according to the requirements in §60.4243(d)(1) through (3), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [40 CFR 60.4243(d)]
  - (1) There is no time limit on the use of emergency stationary ICE in emergency situations. [40 CFR 60.4243(d)(1)]
  - (2) You may operate your emergency stationary ICE for any combination of the purposes specified in §60.4243(d)(2)(i) through (iii) for a

maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §60.4243(d)(3) counts as part of the 100 hours per calendar year allowed by §60.4243(d)(2).

[40 CFR 60.4243(d)(2)]

- (a) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.  
[40 CFR 60.4243(d)(2)(i)]
  - (b) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.  
[40 CFR 60.4243(d)(2)(ii)]
  - (c) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.  
[40 CFR 60.4243(d)(2)(iii)]
  - (3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §60.4243(d)(2). Except as provided in §60.4243(d)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR 60.4243(d)(3)]
- iv. Owners and operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year

as an alternative fuel solely during emergency operations but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of §60.4233. [40 CFR 60.4243(e)]

- v. Owners and operators of all stationary SI ICE must keep records of the information in §60.4245(a)(1) through (4). [40 CFR 60.4245(a)]
  - (1) All notifications submitted to comply with 40 CFR 60 Subpart JJJJ and all documentation supporting any notification. [40 CFR 60.4245(a)(1)]
  - (2) Maintenance conducted on the engine. [40 CFR 60.4245(a)(2)]
  - (3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable. [40 CFR 60.4245(a)(3)]

### **S3. Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall report in accordance with General Condition G12:

### Insignificant Activities

Equipment	Qty.	PTE (ton/yr)	Regulation Basis
Natural Gas Hot Water Heaters: 0.589 MMBtu 0.335 MMBtu 0.399 MMBtu 0.1999 MMBtu 0.19 MMBtu	5	NO <sub>x</sub> = 0.74 (total)	Regulation 1.02, Appendix A, section 1.1
Cooling Tower	1	PM <sub>10</sub> =0.07	Regulation 1.02, Appendix A, section 1.38
Emergency relief vents, stacks and ventilation systems (Votator room evacuation)	3	NA	Regulation 1.02, Appendix A, section 3.10
Pneumatic vacuum transfer systems	7	NA <sup>6</sup>	Regulation 1.02, section 1.38.1.1
Dust or particulate collectors that are located in-doors, vent directly indoors into the work space, collect no more than one ton of material per year and do not collect materials listed in Regulation 5.11, 5.12 or 5.14 (Two Jar Washers that blow particulate matter out from the jars and capture it in a filter box)	2	PM <sub>10</sub> < 1	Regulation 1.02, Appendix A, section 3.21

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.
4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

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<sup>6</sup> Emissions are accounted for in the process.

### Attachment A - Default Emission Factors, Calculation Methodologies, & Stack Tests

Generally, emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc.) or hours of operation of the equipment by the appropriate emission factor and accounting for any control devices unless otherwise approved in writing by the District.

**Table 1 – U1, Peanut Butter Manufacturing**

<b>Emission Point</b>	<b>Description</b>	<b>Emission Factor/Calculation Methodology</b>
E1, E5	Laser Sorters, Unloading	AP-42, Chapter 9, Table 9.10.2.1-1 Assume all PM = PM <sub>10</sub> = PM <sub>2.5</sub> = 0.06 lb/ton
	Laser Sorters, Screening	AP-42, Chapter 9, Table 9.10.2.1-1 PM = 0.40 lb/ton (controlled) PM <sub>10</sub> = PM <sub>2.5</sub> = 0.31 lb/ton (controlled)
E2, E6	Peanut Roasters	AP-42, Chapter 9, Table 9.13.2-1 (coffee roasting EF) Assume all PM = PM <sub>10</sub> = PM <sub>2.5</sub> = 0.66 lb/ton
E3, E7	Peanut Blanchers, Peanut/Ingredients Transfer	AP-42, Chapter 9, Table 9.9.1-1 (grain receiving EF) PM = 0.18 lb/ton PM <sub>10</sub> = 0.059 lb/ton PM <sub>2.5</sub> = 0.01 lb/ton
E4, E8	Optical Sorters, Skins Systems	AP42, Chapter 9, Table 9.10.2.1-1 (hulling/separating EF) PM = 1.1 lb/ton (controlled) PM <sub>10</sub> = PM <sub>2.5</sub> = 0.81 lb/ton (controlled)

**Table 2 – U2, Printers and Sanitizing System**

<b>Emission Point</b>	<b>Description</b>	<b>Emission Factor/ Calculation Methodology</b>
E9	Hitachi Code, PXR-D460W, Date Printer	Material Balance
E10	Fox Jet, FXJT-62701208, Tray Printer	Material Balance
E11	Biomist Inc. Sanitizing System	Material Balance

**Table 3 – UIA1, Emergency Generator**

<b>Emission Point</b>	<b>Description</b>	<b>Emission Factor/ Calculation Methodology</b>
IA1	Natural Gas (RICE) Emergency Generator, Kohler, 350 HP	AP-42 Chapter 3.3